JUSTICE FIRST, LLP 1 Jenny C. Huang, SBN 223596 2831 Telegraph Avenue 2 Oakland, ČA 94609 Telephone: (510) 628-0695 3 Fax: (510) 272-0711 E-mail: jhuang@justicefirstllp.com 4 5 JIVAKA CANDAPPA, SBN 225919 5111 Telegraph Avenue, #215 6 Oakland, ČA 94609 Telephone: (510) 654-4129 7 Fax: (510) 594-9610 E-mail: jcandappa@sbcglobal.net 8 Attorneys for Plaintiff Abhinav Bhatnagar 9 UNITED STATES DISTRICT COURT 10 NORTHERN DISTRICT OF CALIFORNIA 11 Case No.: 3:07-cv-02669 (CEB)(EDL) 12 ABHINAV BHATNAGAR, 13 Plaintiff, STIPULATION AND PROPOSED ORDER FOR CASE MANAGEMENT SCHEDULE 14 VS. 15 JASON INGRASSIA, individually and in his official capacity; COUNTY OF 16 CONTRA COSTA; and CITY OF SAN RAMON. 17 18 Defendants. 19 WHEREAS on August 26, 2008, the parties attended a hearing before Magistrate Judge 20 Laporte, after which the court ordered the parties to submit a proposed case management 21 schedule pursuant to the pretrial and trial dates set by Judge Breyer; 22 WHEREAS Judge Breyer has set the pretrial hearing for December 2, 2008 and the trial 23 for December 8, 2008; 24 WHEREAS Judge Breyer advised the parties at the case management conference on July 25 21, 2008 that the parties could agree upon and determine all other case management scheduling 26 dates, aside from the pretrial and trial dates set; 27 28 STIPULATION & PROPOSED ORDER FOR CASE MANAGEMENT SCHEDULE

1	WHEREAS counsel for the parties have met and agreed upon the proposed case
2	management schedule detailed below;
3	IT IS HEREBY STIPULATED AND AGREED that the following case management
4	schedule shall govern this case:
5	1. Fact discovery shall end on September 30, 2008;
6	2. Expert disclosures shall be hand-delivered by October 6, 2008;
7	3. Rebuttal expert disclosures shall be hand-delivered by October 22, 2008;
8	4. Expert discovery shall end on November 5, 2008;
9	5. All dispositive motions shall be hand-delivered by November 5, 2008;
10	6. Opposition papers on dispositive motions shall be hand-delivered by November 14
11	2008;
12	7. Reply papers on dispositive motions shall be hand-delivered by November 19, 2008;
13	8. Dispositive motions shall be heard on November 21, 2008; and
14	9. The joint pretrial conference statement shall be filed by November 25, 2008
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16	Dated: August 29, 2008 Oakland, California JUSTICE FIRST, LLP Attorneys for Plaintiff Abhinav Bhatnagar
17	By:
18	Jenny C. Huang
19	2831 Telegraph Avenue
20	Oakland, CA 94609 Tel.: (510) 628-0695
21	
22	Dated: August 29, 2008 MCNAMARA, DODGE et al.
23	Walnut Creek, California Attorney for Defendant Jason Ingrassia By:
24	
25	Noah Blechman
26	1211 Newell Avenue
27	Walnut Creek, CA 94596-5331 Tel.: (925) 939-5330
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